

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

SFA SYSTEMS, LLC,	§	
	§	
Plaintiff,	§	
v.	§	
	§	Civil Action No. 6:10-cv-00300-LED
BIGMACHINES, INC.;	§	
BECKMAN COULTER, INC.;	§	JURY DEMANDED
ENTERASYS NETWORKS, INC.;	§	
RICOH AMERICAS CORPORATION;	§	
HYUNDAI MOTOR AMERICA, INC.; and	§	
CARESTREAM HEALTH, INC.,	§	
	§	
Defendants.	§	

**SFA SYSTEMS, LLC’S ANSWER TO THE COUNTERCLAIMS OF
BECKMAN COULTER, INC.**

Plaintiff, SFA Systems, LLC (“SFA”) hereby Answers the Counterclaims of Defendant Beckman Coulter, Inc. (“Beckman Coulter”) filed September 9, 2010 (Dkt 46).

COUNTERCLAIMS

Unless otherwise addressed herein with an admission, the Plaintiff SFA generally denies all allegations in the Counterclaim. Each specific allegation is addressed as follows and corresponds to Beckman Coulter’s counterclaim paragraph numbers:

29. Defendant Beckman Coulter (“Beckman Coulter”) is a Delaware corporation organized and existing under the laws of the State of Delaware with its principal place of business at 250 S. Kraemer Boulevard, Brea, California 92821.

ANSWER: Admitted.

30. On information and belief, Plaintiff SFA Systems, LLC (“SFA”) is a Limited Liability Company existing under the laws of the State of Texas with its principal place of business at 207 C North Washington Avenue, Marshall, Texas 75670.

ANSWER: Admitted.

31. In its Complaint, Plaintiff SFA avers that it owns all rights, title and interest in the patents-in-suit.

ANSWER: Admitted.

32. Subject to Beckman Coulter’s affirmative defenses and denials, Beckman Coulter alleges that this Court has jurisdiction over the subject matter of these Counterclaims under, without limitation, 28 U.S.C. §§ 1331, 1367, 1338(a), 2201 and 2202.

ANSWER: Admitted that Beckman Coulter makes these allegations. SFA denies that Beckman Coulter is entitled to any relief.

33. Based on SFA’s allegations of infringement, the Complaint SFA filed against Beckman, and prior litigation by SFA involving one or more of the patents-in-suit, a justiciable actual controversy exists between Beckman and the Counterclaim Defendant SFA concerning the alleged infringement, validity, and enforceability of the ‘525 Patent.

ANSWER: Admitted.

COUNT ONE

34. Beckman realleges and incorporates herein by reference the allegations in Paragraphs 29-33 above.

ANSWER: SFA realleges and incorporates herein by reference its responses to Beckman Coulter’s allegations in Paragraphs 29-33 above.

35. Beckman has not infringed and is not infringing (either directly, contributorily, or by inducement) any claim of the patents-in-suit.

ANSWER: Denied.

36. Because there exists a real and justiciable controversy between the parties regarding infringement of the '525 Patent, this Court should make declarations that Beckman does not infringe the '525 Patent.

ANSWER: Denied.

COUNT TWO

37. Beckman realleges and incorporates herein by reference the allegations in Paragraphs 29-33 above.

ANSWER: SFA realleges and incorporates herein by reference its responses to the allegations in Paragraphs 29-33 above.

38. The '525 Patent is invalid, void and unenforceable for failure to satisfy one or more of the requirements for patentability specified in 35 U.S.C. § 100 et seq., including, but not limited to §§101, 102, 103 and 112.

ANSWER: Denied.

39. Consequently, there is an actual case or controversy between the parties over the regarding the validity of the '525 Patent, this Court should make declarations that the '525 Patent is invalid.

ANSWER: Denied

EXCEPTIONAL CASE

40. This case is exceptional under 35 U.S.C. § 285.

ANSWER: SFA admits that it should be entitled to recover attorneys' fees under 35 U.S.C. § 285. that Beckman Coulter is entitled to any relief.

Dated: October 4, 2010

Respectfully submitted,

BUETHER JOE & CARPENTER, LLC

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a) on this 4th day of October 2010. Any other counsel of record will be served by facsimile transmission and first class mail.

/s/ Eric W. Buether

Eric W. Buether